

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

NOSTROMO, LLC,	)	Case No. 2:24-cv-00563-JRG-RSP
	)	
Plaintiff,	)	
	)	
v.	)	PATENT CASE
	)	
KYOCERA CORPORATION,	)	JURY TRIAL DEMANDED
	)	
Defendant.	)	
	)	

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**DECLARATION OF KATSUHIKO SUZUKI IN SUPPORT OF KYOCERA  
CORPORATION'S MOTION TO DISMISS COMPLAINT PURSUANT TO FED. R.  
CIV. P. 12(B)(6)**

I, Katsuhiko Suzuki, declare as follows:

1. I am the Executive Officer and the Senior General Manager of Corporate Communication Equipment Group, for Kyocera Corporation. I have personal knowledge of the facts set forth in this declaration. I have a working knowledge of the English language, and I have also confirmed with an English-Japanese translator within Kyocera Corporation that my testimony is accurate from a translation perspective.

2. Kyocera Corporation is incorporated under the laws of Japan, and its corporate headquarters is located at 6 Takeda Tobadono-cho, Fushimi-ku, Kyoto 612-8501, Japan.

3. Kyocera Corporation develops, manufactures, and sells smartphones in Japan.

4. Kyocera Corporation does not develop, manufacture, sell, offer for sale, or import smartphones in the United States.

5. Kyocera International, Inc. is a wholly-owned subsidiary of Kyocera Corporation. Kyocera International, Inc. purchases smartphones from Kyocera Corporation outside of the United States. Kyocera Corporation exports smartphones from Japan and then Kyocera International, Inc. imports those smartphones into the United States and sells those smartphones to Kyocera International, Inc. customers.

6. Kyocera International, Inc. is the proper party to defend against the allegations made in Nostromo, LLC's Complaint in this litigation regarding the accused smartphones as the Complaint implicates actions taken by Kyocera International, Inc. Kyocera International, Inc. is incorporated in California and its corporate headquarters are located in San Diego, California. Kyocera International, Inc. does not have any place of business in the Eastern District of Texas.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on January 14, 2025 in Yokohama, Japan

Katsuhiko Suzuki  
Katsuhiko Suzuki

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this, the 14th day of January, 2025. Any other counsel of record will be served by first class U.S. Mail on this same date.

/s/ Jose L. Patiño

Jose L. Patiño